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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

KARISSA JAYLENE ANDRADE,

Plaintiff,

vs.

COMMISSIONER OF SOCIAL SECURITY,

Defendant.

Civil No. 1:25-cv-00124-SKO

STIPULATION AND UNOPPOSED MOTION
FOR EXTENSION OF TIME; ORDER

(Doc. 23)

IT IS HEREBY STIPULATED by and between the parties, through their undersigned attorneys, with this Court's approval, to extend the time by 30 days, from September 17, 2025 to October 17, 2025, for the Commissioner to file his Cross-Motion for Summary Judgment. Plaintiff's optional reply shall be due within 14 days after the filing of the Commissioner's Cross-Motion.

This is the Commissioner's first request for an extension of time for his Cross-Motion. Plaintiff does not oppose the requested extension.

The undersigned counsel for the Commissioner respectfully submits that good cause exists for the requested extension. Due to staffing reductions and organizational changes, counsel for

1 the Commissioner has been tasked with additional jurisdictional coordinator responsibilities,
2 taking work from other attorneys, and handling more cases, including the instant case, which was
3 recently reassigned to her. Despite diligent efforts to manage her workload, counsel for the
4 Commissioner therefore needs additional time in the instant case to review the administrative
5 record, consider the issues that Plaintiff has raised, confer with her client as necessary, and prepare
6 the Commissioner's Cross-Motion.

7 Respectfully submitted,

8 Dated: September 10, 2025

PENA AND BROMBERG, PC

9 By: /s/ Jonathan Pena*

10 JONATHAN PENA

11 Attorneys for Plaintiff

12 [*As authorized by e-mail on Sept. 10, 2025]

13
14 Dated: September 10, 2025

ERIC GRANT

15 United States Attorney

MATHEW W. PILE

16 Head of Program Litigation 1

17 By: /s/ Margaret Branick-Abilla

MARGARET BRANICK-ABILLA

18 Special Assistant United States Attorney

19 Attorneys for Defendant
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ORDER

Pursuant to the parties' foregoing stipulation and unopposed motion, (Doc. 23), and for good cause shown (Fed. R. Civ. P. 16(b)(4)),

IT IS ORDERED that Defendant shall have up to and including October 17, 2025, to serve Defendant's Cross-Motion for Summary Judgment on Defendant. All other dates in the Scheduling Order, (Doc. 5), are enlarged accordingly.

IT IS SO ORDERED.

Dated: **September 10, 2025**

/s/ Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE